

Pechiney - Completion Reports/Figures
Response to EPA's Comments Provided on August 28 and September 10, 2015



Phase Area	Grid Area	EPA's Comments	Response
			<i>Note - all depths listed below are relative to the building slab and concentrations referenced are for total PCBs in milligrams per kilogram (mg/kg)</i>
I	111, 133	Only one sidewall sample visible around Soil removal area 13	<p>At this location, underground piping was removed to the west (Structure 750) and east (Structure 461) of the soil removal area 13, along with the slabs, tunnel (Structure 541) and footings. Soil removal in Area 13 targeted a near surface soil sample (SS-1) and pre-demo boring #39 (sample at a depth of 2.2 feet) associated with a 2-foot wide trench. After soil and piping/tunnel/footing removals, the soil surface was at 5 to 6 feet, and samples were collected along the bottom at #962, #963 and #964 at 5 feet. The other soil samples in this area that provided verification for the soil removal include:</p> <ul style="list-style-type: none"> • East: #919 at 4 feet (excavated due to discoloration, but PCBs were at 0.613 mg/kg), and #160 at 5 and 7 feet (non-detect) • Southwest: 750-SS-004 at 6 feet (non-detect) • Northwest: 750-SS-005 at 6 feet (0.30 mg/kg) <p>Based on the distribution of samples and verification results, additional samples were not needed in this area</p>
		A verification sample is still needed to the north, excavation does not extend to 750-SS-005	<p>After removal of the structures described above as well as the removal of the material in Soil Removal Area 13, soil north of Soil Removal Area 13 but south of 750-SS-005 to a depth of approximately 6 feet was not present. Soil Removal Area 13 excavation did not have north and south sidewalls; this is why three bottom samples were collected beneath the PCB-impacted area where the soil was removed.</p>

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I	136	Only one sidewall sample visible around 87-SS-010	<p>87-SS-010 was collected at 5 feet with PCBs at 3.67 mg/kg. After structure and soil removal in this area there was no soil to the north, west and south to sample. Other soil samples in this area provided coverage for the remaining side walls or bottom samples in the vicinity of 87-SS-010 as part of the removal of the structure.</p> <p>After soil removal at 87-SS-010 a deeper verification sample 87-SS-011 (non-detect) was collected at 8 feet below 87-SS-010 and an east side wall sample 87-SS-012 (non-detect) was collected at a depth of 8 feet. The other soil samples in this area that provided verification for the remaining side walls or bottom samples in the vicinity of 87-SS-010 were as follows:</p> <ul style="list-style-type: none"> • South: #510, #511, #512 were collected along the side wall at depths of 10, 7 and 3 feet, respectively (0.054, 3.23, and 0.17 mg/kg) • West (bottom): 87-SS-009 was collected at a depth of 12 feet (0.258 mg/kg) • Northwest (sidewall): 87-SS-008 was collected at a depth of 8 feet (non-detect) <p>Based on the distribution of samples and verification results, additional sampling was not needed in this area.</p>
		Agreed that additional sampling is unnecessary	Amec Foster Wheeler concurs.

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II	308	No confirmation samples taken around Soil removal area 15	Soil removal in Area 15 targeted the pre-demolition sample #183. The soil verification/confirmation samples for this area are shown on Figure 2B for the Phase II set of drawings (Grid 241). At this location, there are four side wall samples #1207, #1208, #1209 and #1210, and a bottom sample #1211.
		Comment should have read no sidewall confirmation samples on northeast corner on Soil Removal Areas 5a, 5b, and 5c in vicinity of #740 and #778	Samples #740 and #778 as well as other samples shown in grids 308 and 307 (#710, #711, #741, #713, #738, and #736) were all collected along a temporary road or access ramp that was build adjacent to the soil removal areas to facilitate loading the PCB-impacted soil that was excavated into haul trucks. The access ramp was sampled to assess any potential PCB impacts resulting from hauling impacted material up this ramp and out of the excavation. The sample series #785 to #787 serves as verification sampling for the north and east extents of the soil removal area adjacent to the ramp. The ramp was a slope that did not have sidewalls and the surface of the ramp where the excavator traveled was where the samples such as #740 and #778 were collected.

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II	274, 275	Rectangular excavation straddling grid 274-275 has no samples	<p>The rectangular area straddling grid 274-275 is part of the shoring area where soil was removed to depths of 20 to 24 feet below the top of slab for the installation of the shoring box for the 4a/4b soil removal area. The shoring box was 20 feet wide (east-west) and 120 feet long (north-south). Soil samples (#950 to #961) were collected for PCB analysis along the bottom of the shoring area using a 10 by 20 foot grid. Two locations within the shoring area required the removal of additional soil based on PCB concentrations. One was located at sample #959/#968 (rectangular area straddling grid 274-275) and the other was located at #950/#965 and #952/#966. Soil samples in the shoring area around these sample locations were used as the side wall verification samples.</p> <p>For #959/#968:</p> <ul style="list-style-type: none"> • North – #961 at 22 and 24 feet (3.07 and 0.451 mg/kg) • West - #958 at 20 feet (0.78 mg/kg) • South – #967 at 24 feet (0.36 mg/kg) • East – no side wall - shoring wall and the 4a/4b soil excavation and associated underground warning barrier (UWB). <p>These samples locations are shown on Figure 2B of the Phase II set of drawings.</p>
		Does not believe that any further sampling is needed in this area	Amec Foster Wheeler concurs.

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II	245	No sidewall samples taken around sample #1334 excavation	<p>As soil removal occurred in this area, soil between the smaller removal areas shown on Figure 2B for the Phase II set of drawings was also removed, and side wall samples could not be collected in most cases. Soil at #1301 required removal to a depth of 8 feet. The deeper verification sample #1334 was collected at a depth of 10 feet, and the east side wall sample #1318 was collected at 5 feet. There was no soil remaining to the north, west and south. The other soil samples in this area that provided verification in the vicinity of #1301/#1334 were as follows:</p> <ul style="list-style-type: none"> • South: #1302 was collected at a depth of 7 feet (0.34 mg/kg) • East: #1352 was collected at 10 and 12 feet after soil removal in this area (7.42mg/kg and non-detect) • North: #1300 was collected at depth of 8 feet (0.16 mg/kg) <p>Based on the lack of side walls, distribution of samples and verification results, additional sampling was not needed in this area.</p>
		Please clarify why this soil was removed and the extent of the removal.	<p>Soil between the rectangular excavations approximately 10 feet east of the small (10 foot by 10 foot) square excavations in grid 245 was removed to facilitate loading soil into the haul trucks. A slope existed between the rectangular excavations and the two square excavations such that an eastern sidewall did not exist at the time of the soil removals. See attached Figure 1 clarifying area of soil removed.</p>

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II	275, 290, 305	No eastern side wall samples on excavations in these grid areas	The rectangular area noted as an excavation on Figure 2B for the Phase II set of drawings in grids 275, 290, 305, was a ramp and work area used to access the 4a/4b excavation, rather than an excavation. Structures and footings were removed in the ramp area (Structures 666, 872, and 636). The area was sampled for verification after completion of the 4a/4b excavation and removal of the surrounding structures. Initial samples collected on the ramp area included #1254 through #1257. Due to the detected concentrations of PCBs in soil, the surface of the ramp was scraped to remove additional soil, and the next set of soil sample included #1277 to 1285. Because this area was a ramp, there was no eastern side wall to sample.
		The ramp was sloping downwards to the west, then there is soil to the east that can be sampled further.	Step out samples will be collected to the east of samples #1273 through #1282 at depths between 8 and 13 feet below ground surface and analyzed for PCBs (Figure 2).
III, IV, or VI	532	No sidewall samples visible around 801-SS-002	Structures in the area of 801-SS-002 and the northwest corner of the building pad were removed, leaving behind a large depression resulting in no sidewalls. Sample 801-SS-001/002 were collected in the middle of the depression below Structure 801. The outline of a soil excavation depicted around sample 801-SS-001/002 on Figure 2 for the Phase III, IV, and VI set of drawings was an error and these two samples were verification samples for this area/structures. The PCBs concentrations for samples 801-SS-001 and -002 were 0.079 mg/kg and non-detect, respectively).
		No further sampling is needed in this area.	Amec Foster Wheeler concurs.